

EXHIBIT C



An official website of the United States government

[Here's how you know](#)



THE UNITED STATES
DEPARTMENT OF JUSTICE
JUSTICE NEWS

Department of Justice

Office of Public Affairs

FOR IMMEDIATE RELEASE

Wednesday, June 3, 2020

Justice Department Seeks Forfeiture of More than \$20 Million in Assets Relating to Unlawful Use of U.S. Financial System to Evade and Violate Iranian Sanctions

A forfeiture complaint was filed today in the U.S. District Court for the District of Alaska alleging that assets equivalent to more than \$20 million are subject to forfeiture based on violations of the International Emergency Economic Powers Act (IEEPA) and federal money laundering statutes.

Assistant Attorney General Brian A. Benczkowski of the Justice Department's Criminal Division, U.S. Attorney Bryan Schroder for the District of Alaska, Special Agent in Charge Robert W. Britt of the FBI's Anchorage Field Office and Special Agent in Charge Justin H. Campbell of the IRS-Criminal Investigation's (IRS-CI) Seattle Field Office made the announcement.

The civil forfeiture complaint alleges that Kenneth Zong, a U.S. citizen, conspired with three Iranian nationals to evade the prohibitions of IEEPA and the Iranian Transactions and Sanctions Regulations (ITSR) by engaging in false, fictitious and fraudulent transactions which were designed to unlawfully convert and remove Iranian owned funds in a Korean financial institution, equivalent to approximately \$1 billion U.S. dollars (USD). These funds were held in Korean bank accounts and converted into more easily tradeable currencies, such as USD, through U.S. financial institutions and laundered into and through a host of shell company accounts in multiple jurisdictions, including the United States, the United Arab Emirates and Korea.

Approximately \$20 million in funds traceable to this scheme were used by Zong's co-conspirators to attempt to purchase a hotel in Tbilisi, Georgia in 2011 and 2012. The proceeds of these funds and this attempted transaction are the subject of the forfeiture complaint.

A complaint is merely an allegation. A defendant is presumed innocent until proven guilty beyond a reasonable doubt in a court of law.

The FBI and IRS-CI are investigating the case. Deputy Chief Woo S. Lee and Senior Trial Attorney Michael Olmsted of the Criminal Division's Money Laundering and Asset Recovery Section and Assistant U.S. Attorneys Jonas Walker and Steven Skrocki of the U.S. Attorney's Office for the District of Alaska are prosecuting the case. The Criminal Division's Office of International Affairs provided valuable assistance in this matter.

The department appreciates the significant assistance provided by UAE authorities, including in particular the Dubai Police Department's Anti-money Laundering and Financial Crimes Division and the Government of Ras al Khaimah. The department also appreciates the significant assistance provided by the Office of the Prosecutor General of Georgia and the Supreme Prosecutor's Office and Ministry of Justice of the Republic of Korea.

The year 2020 marks the 150th anniversary of the Department of Justice. Learn more about the history of our agency at www.Justice.gov/Celebrating150Years.

Attachment(s):

7/28/2020

Justice Department Seeks Forfeiture of More than \$20 Million in Assets Relating to Unlawful Use of U.S. Financial System to Evade and ...

[Download Zong Forfeiture Complaint](#)

Topic(s):

Asset Forfeiture

Component(s):

[Criminal Division](#)

[Criminal - Money Laundering and Asset Recovery Section](#)

[USAO - Alaska](#)

Press Release Number:

20-512

CRIM 1 30 CH 05001-101 DOCUMENT 20-3 1000 08/06/20 1000 3 14 3

Updated June 4, 2020